

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES, FOR REIMBURSEMENT OF EXPENSES, AND FOR
SERVICE AWARDS FOR THE CLASS REPRESENTATIVES**

Indirect Purchaser Plaintiffs ("IPPs" or "Class Representatives") Christina Lorenzen, Jessica Jones, and Amy Coulson, by and through Class Counsel,¹ hereby move this Court for an award of attorneys' fees, for reimbursement of expenses, and for service awards for the Class Representatives from the proceeds of a settlement with Defendants Varsity Brands, LLC; Varsity Spirit, LLC; Varsity Spirit Fashions & Supplies, LLC; Charlesbank Capital Partners, LLC; Charlesbank Equity Fund VII, LP; Charlesbank Equity Fund VIII, LP; and Charlesbank Equity Fund IX, LP; Bain Capital Private Equity LP; Bain Capital Fund XII, L.P., Bain Capital Fund (DE) XII, L.P., and Bain Capital Fund (Lux) XII, SCSp, U.S. All Star Federation, Inc., and Jeff Webb, which settlement involved cash payments totaling \$82,500,000.00 in addition to prospective relief. In support of this motion, IPPs submit the following: (i) Memorandum of Law; (ii) Joint Declaration of Joseph R. Saveri, Jason S. Hartley, Richard M. Paul, Daniel E. Gustafson, and Van D. Turner, Jr.; (iii) Declaration of Joseph R. Saveri; (iv) Declaration of

¹ "Class Counsel" includes the five firms appointed Settlement Class Counsel by the Court: Joseph Saveri Law Firm, LLP; Hartley LLP, Paul LLP; Gustafson Gluek PLLC; and Turner Feild, PLLC. See ECF No. 612 at PageID 35672, ¶ 6.

Richard M. Paul III; (v) Declaration of Jason Hartley; (vi) Declaration of Daniel J. Nordin; (vii) Declaration of Van D. Turner, Jr.; and (viii) Declaration of J. Gerard Stranch, IV.

Dated: September 3, 2024

Respectfully submitted,

By: /s/ Joseph R. Saveri
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